

UNITED STATES DISTRICT
COURT SOUTHERN DISTRICT
OF NEW YORK

In re:

SINO-FOREST CORPORATION,

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 13-10361 (MG)

**SUPPLEMENTAL
DECLARATION OF KURT J.
ELGIE REGARDING NOTICE
TO THE CLASS**

KURT J. ELGIE, declare and state as follows:

1. I am a Project Manager with NPT RicePoint Class Action Services Inc. (“NPT RicePoint”) of London, Ontario. NPT RicePoint was appointed to provide notice materials to brokers/nominees, third party filers and beneficial holders in relation to Sino-Forest. In completing the required notice NPT RicePoint worked alongside Gilardi & Co., LLC (“Gilardi”) to administer the notice program. I have the knowledge set out herein. Where that knowledge is based on the information obtained from others, I have so indicated below.
2. Terms that are capitalized, but not defined, in this declaration have the meanings attributed to them in the Settlement Agreement.

Notice Packages

3. Point 3 of the previous declaration (November 14, 2013) referenced all of the broker packages being sent to United States brokers. Of the 4,699 brokers mailed, 39 were to Canadian addresses.

4. Point 6 of the previous declaration (November 14, 2013) referenced 7,587 beneficial holder packages. This number has been updated to 11,331 beneficial holder packages being distributed. Of those, 2,865 were to Canadian addresses and 367 were to addresses other than Canada or the United States. The previous declaration noted that the packages were sent to United States addresses only.
5. I submit this supplemental declaration in order to provide the court with information regarding the mailing of the Notice of Motion to Enforce the Order of the Ontario Court and the Notice of Motion to Recognize and Enforce the Order of the Ontario Superior Court Approving Settlement with Ernst & Young LLP. I am over 21 years of age and am not a party to this action. I have personal knowledge of the facts set forth and, if called as a witness, could and would testify completely thereto.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

A handwritten signature in blue ink, appearing to read "Kurt Elgie", is written over a horizontal line.

Kurt J. Elgie

Executed on November 15, 2013,
in London, Ontario.